



{In Archive} Part 435 Cook Inlet issue

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The ELG program discussed the Cook Inlet issue at some length in the 2004 Plan.

See Section 5.5.9.6 of the 2004 TSD: <http://epa.gov/guide/304m/2004/tsd.pdf>

A couple things to note are:

- (1) We did receive a number of comments on this issue from several Native American Cook Inlet villages and CI Keeper.
- (2) This subsector had a TWPE discharge of ~12,000, which was very small in comparison to the one existing category we did identify - CCH (millions of TWPE).
- (3) We did highlight advances in downhole disposal technology

"Newer injection technology might also make injection of produced water more available. However, EPA does not know how widely these newer technologies can be used across all Cook Inlet facilities. EPA will examine the progress of these technologies in future annual reviews. Given the 16-year lag between NSPS projects, the ability of the permit writer to require an operator to demonstrate that zero discharge is not technically feasible for a specific project, and the relatively low toxicity of the discharges, EPA decided not to revise effluent guidelines for produced water in this subcategory at this time."

(b) (5)



Hope this helps.

Carey